

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF INDIANA**

D5 IRONWORKS, INC., RICHARD	)	
LINDNER, SCOTT KUDINGO, BILL	)	
TONNESEN, JOE WEIL, AND HARRY	)	
HARPER,	)	
	)	
Plaintiffs,	)	Hon. Joseph S. Van Bokkelen
	)	
v.	)	CAUSE NO.: 2:16-CV-200
	)	
LOCAL 395 IRONWORKERS, AFL-CIO,	)	JURY TRIAL REQUESTED
THOMAS WILLIAMSON, SR., THOMAS	)	
WILLIAMSON, JR., AND KNOWN AND	)	Magistrate Judge Paul R Cherry
UNKNOWN CO-CONSPIRATORS,	)	
	)	
Defendants.	)	

**MOTION FOR WITHDRAWAL OF COUNSEL**

The undersigned counsel, Michael E. Avakian, respectfully moves the Court for an Order allowing for withdrawal as counsel of record for Plaintiffs under Local Rule 83-8(c). In support of the Motion, the undersigned states:

1. On July 28, 2016, the Court granted his Application to appear as *pro hac vice* counsel.
2. Robert T. Hanlon also appeared as counsel for Plaintiffs. Mr. Hanlon is a member in good standing in the Bar of this Court.
3. The undersigned was retained by Plaintiffs to serve as labor law counsel. Due to a change in jobs, Mr. Avakian must withdraw from the case. Mr. Hanlon is a seasoned attorney and does not require assistance to represent Plaintiffs' interests at this stage of the case before this Court. Mr. Hanlon will continue to represent the Plaintiffs.

4. The undersigned will file no further papers and should be removed from the docket as counsel of record for Plaintiffs.

5. The undersigned has consulted counsel for Defendant and has been advised of no objection to this motion to withdraw from the case.

6. Trial is scheduled for November 26, 2018. CM/ECF 195.

7. This motion is not interposed for any improper purpose, is not calculated to delay these proceedings, and will not prejudice Defendants.

WHEREFORE, I, Michael E. Avakian, respectfully move this Court to grant my withdrawal as counsel for Plaintiffs. Robert T. Hanlon will remain as counsel of record for Plaintiffs.

Respectfully, submitted,

BY: /s/ Michael E. Avakian  
Michael E. Avakian  
One of Its Attorneys

Robert T. Hanlon (ARDC # 6286331)  
One of Defendants' Attorneys  
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Michael E. Avakian (*pro hac vice*)  
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(202) 540-9704

Dated: August 2, 2018

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that on August 2, 2018, he served a copy of the Motion to Withdraw upon the following attorneys in the above entitled cause of action by electronic mail through the Court's Case Management and Electronic Case Filing system:

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